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Attorney for Defendant
REGINALD JONES

**UNITED STATES OF DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

REGINALD JONES,

Defendant.

Case No.: 2:23-CR-00150-DJC

**STIPULATION AND ORDER RE:
TEMPORARY RELEASE TO
ATTEND DEFENDANT'S SON'S
FUNERAL**

STIPULATION

Sometime during the week of May 7, 2024, the 6-month-old son defendant Reginald Jones shares with his co-defendant Felicia Shaw tragically died. Reginald Jones's father, Marcus Jones (a retired firefighter), has shared with David Fischer that the cause of death is unknown, but due to the baby's age and the circumstances of his death, it is believed the cause of death may be Sudden Infant Death Syndrome (SIDS). David Fischer has confirmed with the funeral director that the funeral is scheduled for May 24, 2024, at noon with burial immediately following at East Lawn Memorial Park, located at 4300 Folsom Blvd., Sacramento, CA 95819. Defendant Reginald Jones is requesting to be temporarily released from custody on May 24, 2024, to attend his son's funeral and to return to custody the same day. He agrees to be under the custody of

1 his father, Marcus Jones, for the entire day. He further agrees not to discuss his case with
2 his significant other/co-defendant, Felicia Shaw, and he agrees to have no contact with one
3 of his other out-of-custody co-defendants, Jazzmine Campbell.

4 Mr. Regniald Jones is in custody at the Wayne Brown Correctional Center in
5 Nevada City, California. The request is that he be temporarily released on May 24, 2024,
6 sometime between 7 a.m. and 8 a.m., to the custody of his father, Marcus Jones, and to
7 return to the Wayne Brown Correctional Facility no later than 8 p.m. the same day, May
8 24, 2024. He would travel between Nevada County and Sacramento County for the purpose
9 of attending the funeral.

10 It is hereby stipulated and agreed between plaintiff, United States of America, and
11 defendant, Reginald Jones, through their attorneys, that Mr. Jones may be temporarily
12 released from custody as set forth below to attend his son's funeral on May 24, 2024.

13 The parties agree that: (1) that the Court may order Mr. Jones temporarily released
14 sometime between 7 a.m. and 8 a.m. on May 24, 2024, with instructions that he return to
15 the Wayne Brown Correctional Center by 8:00 p.m. the same day; (2) that he remain under
16 the custody of his father, Marcus Jones, for the entire day; and (3) that he not discuss his
17 case with Felicia Shaw, and have no contact with Jazzmine Campbell. The parties request
18 the Court to direct the US Marshal Service to coordinate Mr. Jones's release and surrender
19 with the jail as they see fit, within the time frame permitted above. Mr. Jones has signed
20 the attached Notice to Defendant Being Released (modified to fit the conditions of this
21 temporary release) which defense counsel will submit to the Courtroom Deputy for filing
22 before May 24, 2024.

23
24 Respectfully submitted,

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26 Date: May 17, 2024

27 /S/ David D. Fischer
28 DAVID D. FISCHER
Attorney for Defendant
REGINALD JONES

1 Date: May 17, 2024

PHILLIP A. TALBERT

2 Unites States Attorney

3 /s/ Ross Pearson

ROSS PEARSON

4 Assistant United States Attorney

5 **ORDER**

6 Reginald Jones is ordered temporarily released from custody sometime between 7
7 a.m. and 8 a.m. on May 24, 2024, to Marcus Jones, and (1) Reginald Jones is further
8 ordered to surrender himself to the Wayne Brown Correctional Center by 8:00 p.m. that
9 day, (2) that he is ordered to remain under the custody of his father, Marcus Jones, the
10 entire day, and (3) he is ordered not to discuss his case with his co-defendant, Felicia Shaw,
11 and not to have contact with Jazzmine Campbell. The U.S. Marshal Service is directed to
12 make necessary arrangements with the Wayne Brown Correctional Center for Mr. Jones's
13 release and surrender. Mr. Jones is ordered to sign the attached Notice to Defendant Being
14 Released and file it with the Court before his release. All conditions set forth in that notice
15 are hereby ordered.

16 IT IS SO ORDERED.

17 Dated: May 20, 2024

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21 DEBORAH BARNES
22 UNITED STATES MAGISTRATE JUDGE
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